



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

F. # 2012R01666

*271 Cadman Plaza East
Brooklyn, New York 11201*

September 24, 2014

By ECF

Kevin Keating, Esq.
666 Old Country Road
Garden City, NY 11530

Re: United States v. Eduard Munteanu
Criminal Docket No. 12-698 (S-1) (SJF)

Dear Mr. Keating:

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, the government hereby notifies you that it intends to call David Biddiscombe, Retired Special Agent for the Federal Bureau of Investigation, to testify as an expert witness in the above-referenced case.

Special Agent Biddiscombe is expected to testify that he was employed by the DEA for over 23 years, participated in hundreds of drug trafficking investigations and received specialized training in, among other topics, the identification and investigation of narcotics and drug trafficking. He is also expected to testify regarding the monetary value of the drugs at issue in this case, including the wholesale and retail values of the drugs. Furthermore, he will testify about the methods and practices by which controlled substances are transported and distributed within the United States.

The government reserves the right to call a substitute expert witness, as well as to call additional expert witnesses, and will provide advance notice of any intent to do so.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: /s/
Michael P. Robotti
Assistant U.S. Attorneys
(718) 254-7576

cc: Clerk of the Court (SJF) (by ECF)